



# DEMOCRATIC \* NATIONAL \* COMMITTEE

Donald L. Fowler, *National Chair* • Christopher J. Dodd, *General Chair*

September 26, 1996

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
SEP 26 1 29 PM '96

By Hand

Office of the General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Attention: Andre Pineda

Re: MUR 4407

Dear Mr. Pineda:

On August 16, 1996, respondent Democratic National Committee submitted its response to the complaint filed in the above-captioned MUR.

In that response, we contend that the complaint's allegations of coordination of DNC legislative issue advertising between the DNC and the party's candidates are legally irrelevant. We also contend that, even if such allegations were relevant, there is no valid evidence in the complaint supporting these allegations. With respect to the latter point, we noted that the only evidence cited anywhere in the complaint consists of excerpts from the book entitled The Choice, by Bob Woodward. We argued that, this book is not a factual or accurate report of the events and conversations it recounts and, in particular, that the specific excerpts from The Choice on which the complaint relies are neither well-documented nor "substantial" within the meaning of Agenda Document 1979-29, approved by the Commission on November 15, 1979.

To support that proposition further, we are hereby submitting the Declaration of Robert D. Squier, president of the media firm that produced the television advertisements to which the complaint apparently refers. The Squier Declaration confirms that many of the excerpts from the book, specifically the excerpts on which the complaint relies, are inaccurate. In particular, the Squier Declaration specifically asserts that, to the extent that the book suggests that the President controlled and directed the creation and placement of DNC advertising, "it is factually untrue".

We request that this Declaration be treated as a supplement to

*Joseph E. Sandler*  
Joseph E. Sandler, General Counsel  
Neil P. Reiff, Deputy General Counsel  
Attorneys for Respondents Democratic  
National Committee and R. Scott  
Pastrick, as Treasurer



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SEP 26 1 19 PM '95

Robert D. Squier  
William N. Knapp  
Thomas Ochs  
Anita Dunn  
Senior Vice President

BEFORE THE FEDERAL ELECTION COMMISSION

MUR 4407

PRESENTATION OF ROBERT D. SQUIER

I, Robert D. Squier, under penalty of perjury, hereby declare the following:

1. I am President of Squier Knapp Ochs Communications, Inc. ("SKO") located at 511 2nd Street, N.E., Washington, D.C.

2. SKO is a media consultant to the Democratic National Committee ("DNC") and provides general political consulting and strategic advice to the DNC, as well as media services, including the development of a media plan; creation and production of media communications; and targeting, time buying and placement services.

3. As media consultant to the DNC, SKO has to my belief created, produced and placed all DNC television advertisements from 1995 to the present. In addition, as media consultant, I have attended numerous meetings with the President.

4. I am familiar with the book by Bob Woodward, The Choice, and have read in detail the sections excerpted and attached to the complaint in this matter. Many excerpts are inaccurate, including many of the thoughts attributed to me.

5. Woodward on page 235 claims, "(a)t weekly evening meeting in the White House, Clinton went through (scripts), offered suggestions, and even edited some of the scripts." This statement is not true. Regular meetings, did in fact, occur but not for the purpose of writing, editing or working on the scripts. Rather, final proposals for DNC ads were presented. Often, the President would comment or ask questions. But the entirety of the process, with the exception of the final presentation, took place outside the White House, without the President's involvement.

511 2ND Street, NE Washington, D.C. 20002

202 547-4970 FAX: 202 543-6911

202-547-4970

6. Woodward continues on page 236, "(Clinton) directed the process, trying out what he wanted to say, what might work, how he felt about it, and what it meant." This statement is not true. The entirety of the process, such as it was, was conducted by the strategists, pollsters, and media consultants, not by the President. The strategists, pollsters and media consultants, not the President, determined what to say and what might work. Only when a proposal was fully developed would it be presented to the President.

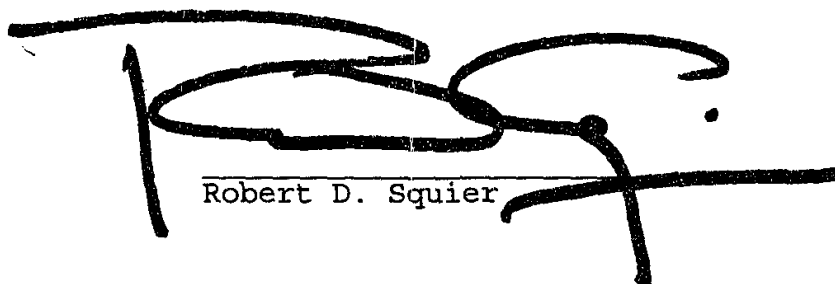
7. Finally, on page 354, in discussing an advertisement entitled "Slash", Woodward purports to set forth dialogue and an argument between myself and the President. This scene never occurred. The President never made the statements attributed to him on page 354. In addition, even the idea that I would argue with or "press" the President hard is not only untrue, it is ludicrous.

8. Although the president was advised of final proposals, to the extent that The Choice suggests that he controlled and directed the creation and placement, it is factually untrue.

9. In addition, to the extent that The Choice suggests that the President was intimately involved in the details of the DNC ads, is factually untrue. That is the job of the strategists, pollsters and media consultants.

I declare under penalty of perjury that the foregoing is true and accurate.

Executed on the 20th day of September, 1996



Robert D. Squier